

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

EDWARD O'BRIAN WILLIAMS)
)
Plaintiff,)
)
V.) **Case No. 5:12-cv-01026-AKK**
)
VALLEY SERVICES, INC.)
)
Defendant.)

JOINT MOTION FOR PROTECTIVE ORDER

Plaintiff Edward O'Brian Williams and Defendant Valley Services, Inc. hereby jointly move this Honorable Court to enter the attached Protective Order. In support of this motion, the parties state as follows:

1. The above-named parties have jointly agreed to the entry of the attached order.
2. The parties anticipate discovery pertaining to Defendant's current and former employees, Defendant's policies, procedures and practices, as well as confidential information pertaining to Plaintiff. The attached Protective Order will preserve the confidentiality of these documents.

WHEREFORE, the parties jointly move the Court to enter the attached order.

Signed this 29th day of October, 2012.

Respectfully submitted,

/s/ Lynlee Wells Palmer
Lynlee Wells Palmer

One of the Attorneys for Defendant
Valley Services, Inc.

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